

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

WILLIAM A. PARUS,

Plaintiff,

and

GERMANTOWN MUTUAL INSURANCE
COMPANY,

Case No. 05 C 0063 C

Intervening Plaintiff,

v.

ANDREW C. CATOR; THOMAS KROEPLIN;
DAWN BRESNAHAN, individually and in her official
capacity as an employee of the Town of Minocqua Police
Department; TOWN OF MINOCQUA, WISCONSIN;
CLAY KREITLOW, individually and in his official
capacity as an employee of the Town of Woodruff Police
Department; and TOWN OF WOODRUFF,
WISCONSIN,

Defendants.

PLAINTIFF'S PROPOSED SPECIAL VERDICT

1. Do you find that on September 20, 2004, Clay Kreitlow knowingly obtained William Parus's name and address that had been taken from a Wisconsin motor vehicle record?

Yes _____ No _____

2. Do you find that Clay Kreitlow obtained William Parus's name and address for a purpose other than legitimate law enforcement?

Yes _____ No _____

3. Do you find that on September 20, 2004, Tom Kroeplin knowingly obtained William Parus's name that had been taken from a Wisconsin motor vehicle record?

Yes _____ No _____

4. Do you find that Tom Kroeplin obtained William Parus's name for a purpose other than legitimate law enforcement?

Yes _____ No _____

If you answered "Yes" to the previous question, then answer this:

5. Do you find that Tom Kroeplin's conduct caused injury to William Parus?

Yes _____ No _____

If you answered "Yes" to the previous question, then answer this:

6. What amount of money will fully and fairly compensate William Parus for his injury?

\$ _____

7. Do you find that the conduct of Tom Kroeplin demonstrated a willful or reckless disregard of the law?

Yes _____ No _____

If you answered "Yes" to the previous question, then answer this:

8. What amount of money do you award as punitive damages against Tom Kroeplin?

\$ _____

If you answered "yes" to question #2, then answer this:

9. Do you find that the conduct of Clay Kreitlow demonstrated a willful or reckless disregard of the law?

Yes _____ No _____

If you answered "Yes" to the previous question, then answer this:

10. What amount of money do you award as punitive damages against Clay Kreitlow?

\$ _____